

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE:**

**MIRENA IUS LEVONORGESTREL-RELATED  
PRODUCTS LIABILITY LITIGATION (NO. II)**

**17-MD-2767 (PAE)**

**17-MC-2767 (PAE)**

***This Document Relates To All Actions***

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**PLAINTIFFS' MOTION TO EXCLUDE THE GENERAL CAUSATION  
EXPERT TESTIMONY OF TODD A. LEE, PHARM.D.**

Plaintiffs move to exclude the general causation expert testimony of Todd A. Lee, Pharm.D., pursuant to Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993). In support of this Motion, Plaintiffs rely on their Memorandum of Law in Support of Plaintiffs' Motion to Exclude the General Causation Expert Testimony of Todd A. Lee, Pharm.D., attached hereto, and their Memorandum in Support of Plaintiffs' Omnibus Motion to Exclude Defendants' General Causation Expert Witnesses.

WHEREFORE, Plaintiffs respectfully request an Order from this Court excluding the general causation expert testimony of Todd A. Lee, Pharm.D., and granting Plaintiffs such other and further relief as the Court deems just and proper. Pursuant to Local Rule 6.1 of the United States District Court for the Southern District of New York, Plaintiffs respectfully request oral argument on this motion.

Dated: March 2, 2018

Respectfully submitted,

/s/ Maxwell S. Kennerly  
Maxwell S. Kennerly  
Kennerly Loutey, LLC  
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*Co-Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed via the ECF/CM system with the Clerk of the Court, which will have sent notice to all attorneys of record in this matter on March 2, 2018.

*/s/ Maxwell S. Kennerly*

Maxwell S. Kennerly